



CDSS

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STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES

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EDMUND G. BROWN JR.
GOVERNOR

September 20, 2018

Letty Garza, Director
Trinity County Health & Human Services Department
One Industrial Parkway
P.O. Box 1470
Weaverville, CA 96093

Dear Ms. Garza:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the reviewer from our office during the course of the Civil Rights Compliance Review of April 2, 2018 through April 5, 2018. Enclosed is the final report on the review.

There are some compliance issues (deficiencies) identified in the report, which will require the development of a Corrective Action Plan (CAP). Please submit your CAP within 60 days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the enclosed report.

Please submit your CAP in both hardcopy and, in an effort to comply with the Americans with Disabilities Act website accessibility, we also require the CAP to be submitted electronically as a Word document via crb@dss.ca.gov.

We will provide a copy of your report to any individual who makes a valid Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it becomes a public document as well. In addition, these documents are published at <http://www.cdss.ca.gov/inforesources/Civil-Rights/Compliance-Reports-and-Corrective-Action-Plans>

If you need technical assistance in the development of your CAP, please feel free to contact James Urquizo at (916) 607-5916. You may also contact us at crb@dss.ca.gov.

Sincerely,

Original signed by Christina Teixeira

CHRISTINA TEIXEIRA, Manager
Civil Rights Unit
Housing, Homelessness, and Civil Rights Branch

Enclosure

cc: Letty Garza, Civil Rights Coordinator

Kim McCoy Wade, Chief
CalFresh Branch

Tami Gutierrez, Chief
CalFresh Operations Bureau

Alexis Fernandez, Chief
CalFresh Policy Bureau

Francisco Verduzco, Chief
CalFresh Technical Assistance and Evaluation Section

Jacqueline Hom
County Operations Manager

Joe Torres, Office of Civil Rights
USDA Food and Nutrition Services
Supplemental Nutrition Assistance Program (SNAP)
Western Region

Maribelle Balbes, Chief
USDA Food and Nutrition Services
Supplemental Nutrition Assistance Program (SNAP)
Western Region

Kevin Aslanian
Coalition of California Welfare Rights Organizations, Inc.

Antoinette Dozier
Western Center on Law and Poverty

**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
Trinity County Health and Human Services Department**

**Conducted on
April 2, 2018 through April 5, 2018**

**California Department of Social Services
Housing, Homelessness, and Civil Rights Branch
Civil Rights Unit
744 P Street, M.S. 8-16-70
Sacramento, CA 95814
(916) 654-2107**

Reviewer: Jaime Urquizo

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I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Unit (CRU) staff was to assess the Trinity County Health and Human Services Department with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on April 2, 2018 through April 5, 2018. An exit interview was held on April 5, 2018, to review the preliminary findings.

The review was conducted in the following locations:

Name of Facility	Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
Murray Bldg.	Tule Creek Road Hayfork, CA	Calworks, Calfresh	None
Industrial Park Way	Industrial Park Way Weaverville CA # 1	IHSS, Calfresh	None
Industrial Park Way	Industrial Park Way,	CPS, Foster Care	None
101 Park Avenue	101 Park Avenue, Weaverville, CA	CPS, Foster Care	None

II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the **2018-2019** Civil Rights Compliance Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.
- Reviewed the previous Compliance Reviews and Corrective Action Plans (CAP) submitted by the County.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of civil rights coordinator
- Survey of program managers
- Case file reviews
- Facility inspections
- Discussion with community advocate groups. In this review the following organization(s) were contacted for feedback.

Trinity Community Clinic
31 Easter Ave
P.O. Box 1229
Weaverville, CA 96093
(530) 623-4186 (530) 623-4397 fax

Shasta Community College
30 Arbuckle Court
Weaverville, CA
(530) 623-2231

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Program Accessibility for Clients with Disabilities (physical, mental, learning, visual or hearing impairment, etc.)
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Eligibility Workers	10	0
Children Social Workers	5	0
Receptionist/Screeners	6	0
Total	21	0

Civil Rights Coordinator and Program Manager Surveys

Number of surveys distributed: (3)

Number of surveys received: (3)

Reviewed Case Files

English speakers' case files reviewed: (34)

Non-English or limited-English speakers' case files reviewed: (1)

Languages of clients' cases: (English / Spanish)

Reasonable Accommodation cases reviewed: (6)

Sections III through IX of this report contain specific Division 21 civil rights requirements and present field review findings regarding the County's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section X evaluates the County's Call/Service Centers services provided to non-English speaking clients and clients with a disability.

Section XI reviews the County's compliance plan, and provides either approval of the plan as submitted, or lays out additional information to be submitted to gain approval.

Section XII highlights issues pointed out by Community Input and summarizes Reviewer Observations.

Section XIII of the report is reserved for a declaration of overall compliance.

III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

A. Findings: Access to Services, Information and Outreach

Question (Please answer yes/no and provide response with comments.)	Comments
Does the County accommodate clients by flexing/extending their hours or allowing applications to be mailed in?	Yes, clients can mail in information as needed.
Can clients, including those with disabilities, access services when they are unable to go to the office?	Yes, clients access services online or by phone. County Staff also accommodate persons with disabilities via home visits. This is a close knit community where a client may be visited by a worker. Clients are informed of these options verbally at intake and on the phone.
Does the County ensure the awareness of available services individuals in remote areas?	Yes, the County informs clients of remote location services at intake and over the phone.

B. Findings: Signage, Posters and Pamphlets

Question (Please answer yes/no and provide response with comments.)	Comments
Does the County use the CDSS pamphlet "Your Rights under California Welfare Programs" (Publication 13 – August 2016)?	Yes, Publication 13 (PUB 13) is available to all clients.
Is the pamphlet distributed and explained to each client at intake and re-certification?	Yes, at intake all clients are briefed using PUB 13.
Is the current version of Publication 13 available in Arabic, Armenian Cambodian, Chinese, English, Farsi Hmong, Japanese, Korean, Lao Mien, Portuguese, Punjabi, Russian Spanish, Tagalog, Ukrainian, and Vietnamese?	Yes, receptionists are aware of where to obtain PUB 13 in other languages.
Were the current versions of the required posters present in the lobbies?	Yes, current versions of the required posters are available.

Question (Please answer yes/no and provide response with comments.)	Comments
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non- English-speaking clients translated into appropriate languages?	Yes, instructional and directional signs are well posted in lobby areas.

C. Corrective Actions: None.

D. Recommendation: None.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The County must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

A. Findings and Corrective Actions

1. Facility Location: (Murray Building - Tule Creek Road, Hayfork, CA)

Facility Element/Finding	Corrective Action
Parking: 2 parking lot signs at entry to parking lot are missing.	<p>An additional sign shall be posted either in a conspicuous place at each entrance to an off-street parking facility OR immediately adjacent to on-site accessible parking and visible from each parking space.</p> <p>(CA T24 11B-502.8) page 170</p> <p>The additional sign shall not be less than 17 inches wide x 22 inches high.</p> <p>(CA T24 11B-502.8.1, Figure 4) page 170</p> <p>The additional sign shall clearly state in letters with a minimum height of 1 inch: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or special license plates issued for persons with disabilities will be towed away at the owner's expense. Towed vehicles may be reclaimed at: _____ or by telephoning _____."</p> <p>(CA T24 11B-502.8.2) page 170</p> <p>Blank spaces shall be filled in with appropriate information as a permanent part of the sign.</p> <p>(CA T24 11B-502.8.2) page 170</p>
Disabled Parking Sign: First (from left) disabled parking space sign is too low at 38 inches height.	<p>Signs shall be 60 inches minimum above the finish floor or ground surface measured to the bottom of the sign.</p> <p>(CA T24 11B-502.6) (ADA 502.6) page 169</p> <p>Additional language or an additional sign below the International Symbol of Accessibility shall state "Minimum Fine \$250".</p> <p>(CA T24 11B-502.6.2) page 169</p>

Facility Element/Finding	Corrective Action
<p>Disabled Parking Sign:</p> <p>Second (from left) disabled parking space sign is too low at 36 inches height.</p> <p>Same disabled parking space sign missing additional sign with fine language "Minimum Fine \$250"</p>	<p>Signs shall be 60 inches minimum above the finish floor or ground surface measured to the bottom of the sign.</p> <p>(CA T24 11B-502.6) (ADA 502.6) page 169</p> <p>Additional language or an additional sign below the International Symbol of Accessibility shall state "Minimum Fine \$250".</p> <p>(CA T24 11B-502.6.2) page 169</p>
<p>Disabled Parking Sign:</p> <p>Third (from left) disabled parking space sign is too low at 36 inches height.</p> <p>Same disabled parking space sign missing additional sign with fine language "Minimum Fine \$250"</p>	<p>Signs shall be 60 inches minimum above the finish floor or ground surface measured to the bottom of the sign.</p> <p>(CA T24 11B-502.6) (ADA 502.6) page 169</p> <p>Additional language or an additional sign below the International Symbol of Accessibility shall state "Minimum Fine \$250".</p> <p>(CA T24 11B-502.6.2) page 169</p>
<p>Disabled Parking Sign:</p> <p>Fourth (from left) disabled parking space sign is too low at 34 inches height.</p> <p>Same disabled parking space sign missing additional sign with fine language "Minimum Fine \$250"</p>	<p>Signs shall be 60 inches minimum above the finish floor or ground surface measured to the bottom of the sign.</p> <p>(CA T24 11B-502.6) (ADA 502.6) page 169</p> <p>Additional language or an additional sign below the International Symbol of Accessibility shall state "Minimum Fine \$250".</p> <p>(CA T24 11B-502.6.2) page 169</p>
<p>Parking Access Aisles:</p> <p>Two Disabled Parking Access Aisles missing language "No Parking" stenciled on the access aisle on the parking lot surface.</p>	<p>The words "NO PARKING" shall be painted on the surface of each access aisle.</p> <p>(CA T24 11B-502.3.3) page 176</p> <p>This notice shall be painted in white letters a minimum of 12 inches in height and located to be visible from the adjacent vehicular way.</p> <p>(CA 11B-502.3.3) pg. 176</p>

Facility Element/Finding	Corrective Action
<p><i>Continued from previous page</i></p>	<p><i>Continued from previous page</i></p> <p>Access aisles shall be marked with a blue painted borderline around their perimeter.</p> <p>(CA T24 11B-502.3.3) (ADA 502.3.3) page 176</p> <p>The area within the blue borderlines shall be marked with hatched lines a maximum of 36 inches on center in a color contrasting with that of the aisle surface, preferably blue or white.</p> <p>(CA T24 11B-502.3.3) page 176</p>
<p>Accessible Signage:</p> <p>Front entry to building did not have a disabled access sign.</p>	<p>In existing buildings and facilities where not all entrances comply with Section 33 (Doors, Doorways and Gates), entrances complying with Section 33 (Doors, Doorways and Gates) shall be identified by the International Symbol of Accessibility complying with "International Symbol of Accessibility" heading in Section 57 (Signs & Identification).</p> <p>(CA T24 11B-216.6) (ADA 216.6) page 28</p>
<p>Publication 13:</p> <p>Available in large print (06/11), Braille (12/04) and audio (05/01)</p> <p>Receptionist was not aware of where to obtain PUB 13 in Braille, Audio, and to obtain a Civil Rights complaint form.</p>	<p>PUB 13 is available in the following required languages: Arabic, Armenian, Cambodian, Chinese, English, Farsi, Hmong, Japanese, Korean, Lao Mien, Portuguese, Punjabi, Russian, Spanish, Tagalog, Ukrainian, Vietnamese (18 languages total)</p> <p>Current: 06/11 (Division 21-107.221).</p> <p>Pamphlets supplied by CDSS entitled "Your Rights Under California Welfare Programs" shall be made available in all CWD waiting rooms and reception areas and shall be distributed and explained to each applicant/recipient at intake and reinvestigation of eligibility. The pamphlets shall be in the primary languages of the CWD's applicant/recipient population including alternate formats (cassette tapes, large print, et cetera.).</p> <p>(Division 21-107.221)</p>

Facility Element/Finding	Corrective Action
<p>Client Interview Rooms and Booths:</p> <p>If there is signage, is the signage compliant? Signage to be 40 inches maximum height.</p> <p>Interview / Conference room did not have a disabled access sign at entry to room.</p>	<p>Installation height above finished floor shall be 40 inches maximum.</p> <p>(CA T24 11B-703.5)</p> <p>(ADA 703.5) page 379</p>
<p>Client Interview Rooms and Booths:</p> <p>If there is signage, is the signage compliant? Signage to be 40 inches maximum height.</p> <p>Interview room did not have disabled access sign at the entry to the room.</p>	<p>Installation height above finished floor shall be 40 inches maximum.</p> <p>(CA T24 11B-703.5)</p> <p>(ADA 703.5) page 379</p>
<p>Client Interview Rooms and Booths:</p> <p>Interview room did not have unobscured table depth.</p>	<p>Where knee clearance is required under an element as part of a clear floor space, the knee clearance shall be 11 inches minimum deep at 9 inches above the finish floor or ground and 8 inches minimum deep at 27 inches above the finish floor or ground.</p> <p>(CA T24 11B-306.3.3) (ADA 306.3.3) page 216</p> <p>Knee clearance shall be 30 inches minimum wide.</p> <p>(CA T24 11B-306.3.5) (ADA 306.3.5) page 216</p>
<p>Bathroom:</p> <p>Is the toilet tissue dispenser located within 7 inches to 9 inches of the front edge of the toilet, 19 inches minimum</p>	<p>Toilet paper dispensers shall be 7 inches minimum and 9 inches maximum in front of the water closet measured to the centerline of the dispenser.</p> <p>(CA T24 11B-604.7) (ADA 604.7) page 320</p>

Facility Element/Finding	Corrective Action
<p><i>Continued from previous page</i></p> <p>in height, and under the grab bar?</p> <p>The toilet tissue dispenser is too far from the edge of the toilet at 3 feet.</p>	<p><i>Continued from previous page</i></p> <p>The outlet of the dispenser shall be below the grab bar, 19 inches minimum. above the finish floor and shall not be located behind grab bars.</p> <p>(CA T24 11B-604.7) (ADA 604.7) page 320</p> <p>Dispensers shall not be of a type that controls delivery or that does not allow continuous paper flow.</p> <p>(CA T24 11B-604.7) (ADA 604.7) page 320</p> <p>Toilet paper dispensers shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist.</p> <p>(CA T24 11B-309.4) page 320</p>
<p>Bathroom Accessories:</p> <p>Bathrooms must include Paper Toilet Protector sheets.</p> <p>Paper Toilet seat receptacle is too tall at 56 inches (shall be 40 inches maximum)</p>	<p>Where towel or sanitary napkin dispensers, waste receptacles, or other accessories are provided in toilet facilities, at least one of each type shall be located on an accessible route.</p> <p>(CA T24 11B-603.5) page 319</p> <p>All operable parts, including coin slots, shall be 40 inches maximum above the finish floor.</p> <p>(CA T24 11B-603.5) page 319</p>
<p>Bathroom:</p> <p>Is there proper signage on the door?</p> <p>Bathroom door sign did not have a wheelchair logo. Bathroom doors signs must have raised braille lettering.</p>	<p>The International Symbol of Accessibility shall be mounted at 58 inches minimum and 60 inches maximum above the finish floor or ground surface measured from the centerline of the International Symbol of Accessibility.</p> <p>(CA T24 11B-703.7.2.6) page 310</p>

Facility Element/Finding	Corrective Action
<p><i>Continued from previous page</i></p>	<p><i>Continued from previous page</i></p> <p>Where a door is provided the symbol shall be mounted within 1 inch of the vertical centerline of the door.</p> <p>(CA T24 11B-703.7.2.6) page 310</p> <p>Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side.</p> <p>(CA T24 11B-703.4.2) (ADA 703.4.2) page 311</p>
<p>Bathroom:</p> <p>Is there proper signage on the door?</p> <p>Bathroom Door sign is at 63 inches above the finish floor from the centerline. Bathroom door signs must be at 58 inches to 60 inches <i>Continued from previous page</i></p> <p>above the finish floor from the centerline.</p>	<p>The symbol shall be mounted at 58 inches minimum and 60 inches maximum above the finish floor or ground surface measured from the centerline of the International Symbol of Accessibility.</p> <p>(CA T24 11B-703.7.2.6) page 310</p> <p>Where a door is provided the symbol shall be mounted within 1 inch of the vertical centerline of the door.</p> <p><i>Continued from previous page</i></p> <p>(CA T24 11B-703.7.2.6) page 310</p> <p>Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side.</p> <p>(CA T24 11B-703.4.2) (ADA 703.4.2) page 311</p>
<p>Bathroom:</p> <p>Is there proper signage on the wall?</p> <p>Bathroom disabled wall sign was not available.</p>	<p>Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side.</p> <p>(CA T24 11B-703.4.2) (ADA 703.4.2) page 311</p> <p>Where there is no wall space at the latch side of a single door or at the right side of double doors, signs shall be located on the nearest adjacent wall.</p> <p>(CA T24 11B-703.4.2) (ADA 703.4.2) page 311</p>

- 2. Facility Location: (Industrial Parkway Building #1– Weaverville CA)**

Civil Rights Compliance Review
Trinity County Health and Human Services Department
April/ 2018

Facility Element/Finding	Corrective Action
<p><i>Continued from previous page</i></p> <p>Signage on pavement clearly depicts a wheelchair with occupant?</p> <p>All disabled parking lines need to be repainted because the painted is faded. The lines are hard to see.</p>	<p><i>Continued from previous page</i></p> <p>(CA T24 11B-502.6.4.1) pg. 169</p> <p style="text-align: center;"><u>OR</u></p> <p>...in white or a suitable contrasting color</p> <p>(CA T24 11B-502.6.4.2) pg. 169</p> <p>The centerline of the International Symbol of Accessibility shall be a maximum of 6 inches from the centerline of the parking space, its sides parallel to the length of the parking space and its lower corner at, or lower side aligned with, the end of the parking space length.</p> <p>(CA T24 11B-502.6.4.2) pg. 169</p>
<p>Parking:</p> <p>Sign Height? 60 inches minimum height if not on accessible route, 80 inches</p> <p><i>Continued from previous page</i></p> <p>minimum height when on accessible route.</p> <p>First sign, from the left, disabled parking sign (on a non-accessible route) is too low at 60 inches height.</p> <p>Same disabled parking space sign is missing the additional sign with fine language "Minimum Fine \$250"</p>	<p>Signs shall be 60 inches minimum above the finish floor or ground surface measured to the bottom of the sign.</p> <p>(CA T24 11B-502.6) (ADA 502.6) page 169</p> <p><i>Continued from previous page</i></p> <p>Additional language or an additional sign below the International Symbol of Accessibility shall state "Minimum Fine \$250".</p> <p>(CA T24 11B-502.6.2) page 169</p>

Facility Element/Finding	Corrective Action
<p>Parking:</p> <p>Sign Height? 60 inches minimum height if not on accessible route, 80 inches minimum when on accessible route.</p> <p>Second disabled parking sign is too low at 60 inches height.</p> <p>Same disabled parking spot sign is missing the additional sign with fine language "Minimum Fine \$250"</p>	<p>Signs shall be 60 inches minimum above the finish floor or ground surface measured to the bottom of the sign.</p> <p>(CA T24 11B-502.6) (ADA 502.6) page 169</p> <p>Additional language or an additional sign below the International Symbol of Accessibility shall state "Minimum Fine \$250".</p> <p>(CA T24 11B-502.6.2) page 169</p>
<p>Parking:</p> <p>Sign Height? 60 inches minimum height if not on accessible route, 80 inches min when on accessible route.</p> <p>Third disabled parking sign missing.</p>	<p>Signs shall be 60 inches minimum above the finish floor or ground surface measured to the bottom of the sign.</p> <p>(CA T24 11B-502.6) (ADA 502.6) page 169</p> <p>Additional language or an additional sign below the International Symbol of Accessibility shall state "Minimum Fine \$250".</p> <p>(CA T24 11B-502.6.2) page 169</p>
<p>Main Entrance:</p> <p>Door Pressures must be 5 pounds or less and 15 pounds for fire doors.</p> <p>Front entry door pressure is too high at 6.5 pounds.</p>	<p>The force for pushing or pulling open a door or gate other than fire doors shall be as follows:</p> <ol style="list-style-type: none"> 1. Interior hinged doors and gates: 5 pounds maximum 2. Sliding or folding doors: 5 pounds maximum 3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 pounds. Exterior hinged doors: 5 pounds maximum. <p>(CA T24 11B-404.2.9 (1 - 4))</p> <p>(ADA 404.2.9 (1 & 2)) page 224</p>

- a. **Corrective Actions:** Refer to Corrective Action column above (Section A, 2).
- b. **Recommendation:** Address and submit a Corrective Action Plan to correct all items identified in the Corrective Action column above (Section A, 2).

3. **Facility Location: (Industrial Parkway Building #2 – Weaverville CA)**

Facility Element/Finding	Corrective Action
<p>Parking:</p> <p>All disabled parking space lines need to be repainted because the lines are faded and difficult to see.</p>	<p>The words “NO PARKING” shall be painted on the surface each access aisle.</p> <p>(CA T24 11B-502.3.3) page 176</p> <p>This notice shall be painted in white letters a minimum of 12 inches in height and located to be visible from the adjacent vehicular way.</p> <p>(CA 11B-502.3.3) pg. 176</p> <p>Access aisles shall be marked with a blue painted borderline around their perimeter.</p> <p>(CA T24 11B-502.3.3) (ADA 502.3.3) page 176</p> <p>The area within the blue borderlines shall be marked with hatched lines a maximum of 36 inches on center in a color contrasting with that of the aisle surface, preferably blue or white.</p> <p>(CA T24 11B-502.3.3) page 176</p>
<p>Parking:</p> <p>Disabled Parking Access Aisle</p> <p>The disabled parking access aisle is missing language “No Parking” stenciled on the access aisle parking floor.</p>	<p>The words “NO PARKING” shall be painted on the surface each access aisle.</p> <p>(CA T24 11B-502.3.3) page 176</p> <p>This notice shall be painted in white letters a minimum of 12 inches in height and located to be visible from the adjacent vehicular way.</p> <p>(CA 11B-502.3.3) page 176</p> <p>Access aisles shall be marked with a blue painted borderline around their perimeter.</p>

Facility Element/Finding	Corrective Action
<p><i>Continued from previous page</i></p>	<p><i>Continued from previous page</i></p> <p>(CA T24 11B-502.3.3) (ADA 502.3.3) page 176</p> <p>The area within the blue borderlines shall be marked with hatched lines a maximum of 36 inches on center in a color contrasting with that of the aisle surface, preferably blue or white.</p> <p>(CA T24 11B-502.3.3) page 176</p>
<p>Parking:</p> <p>Disabled Parking Lines. Accessible Parking space minimums: 9 inches wide, 18 inches long, and 5 inches for access aisles.</p> <p>2 parking space length lines were too short. The lengths are at 13 inches and 17.5 inches.</p>	<p>Parking space minimum dimensions: 9 inches wide by 18 inches long.</p> <p>(CA T24 11B-502.2 Figure 9) (ADA 502.2) page 174</p> <p>Access aisle minimum dimensions: 5 inches wide by 18 inches long.</p> <p>(CA T24 11B-502.2 Figure 9) (ADA 4.6.3) page 174</p> <p>Access aisles shall adjoin an accessible route.</p> <p>(CA T24 11B-502.3) (ADA 502.3) page 173</p> <p>Two parking spaces shall be permitted to share a common access aisle.</p> <p>(CA T24 11B-502.3) (ADA 502.3) page 173</p> <p>Access aisles serving car and van parking spaces shall be minimum 5 inches wide.</p> <p>(CA T24 11B-502.3.1) (ADA 502.3.1) page 173</p> <p>Access aisles shall extend the full required length of the parking spaces they serve.</p> <p>(CA T24 11B-502.3.2) (ADA 502.3.2) page 173</p>

Facility Element/Finding	Corrective Action
<p>Parking:</p> <p>Disabled Parking Signs. Sign height 60 inches minimum height if not on accessible route and 80 inches minimum when on accessible route.</p> <p>Disabled parking spot sign missing.</p>	<p>Signs shall be 60 inches minimum above the finish floor or ground surface measured to the bottom of the sign.</p> <p>(CA T24 11B-502.6) (ADA 502.6) page 169</p> <p>Additional language or an additional sign below the International Symbol of Accessibility shall state "Minimum Fine \$250".</p> <p>(CA T24 11B-502.6.2) page 169</p>
<p>Bathroom Door Sign:</p> <p>Accessible Signage: Is there proper signage on the door?</p> <p>Outside bathroom door disabled access sign is not displaying the wheelchair symbol (upraised symbols in braille).</p>	<p>The International Symbol of Accessibility shall be mounted at 58 inches minimum and 60 inches maximum above the finish floor or ground surface measured from the centerline of the symbol.</p> <p>(CA T24 11B-703.7.2.6) page 310</p> <p>Where a door is provided the International Symbol of Accessibility shall be mounted within 1 inch of the vertical centerline of the door.</p> <p>(CA T24 11B-703.7.2.6) page 310</p> <p>Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side.</p> <p>(CA T24 11B-703.4.2) (ADA 703.4.2) page 311</p>
<p>Bathroom Wall Sign:</p> <p>Accessible Signage: Is there proper signage on the wall?</p> <p>Outside bathroom disabled access wall sign is missing.</p>	<p>Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side.</p> <p>(CA T24 11B-703.4.2) (ADA 703.4.2) page 311</p> <p>Where there is no wall space at the latch side of a single door or at the right side of double doors, signs shall be located on the nearest adjacent wall.</p> <p>(CA T24 11B-703.4.2) (ADA 703.4.2) page 311</p>

Facility Element/Finding	Corrective Action
<p>Lobby:</p> <p>Are Publication 13's in threshold languages available in the lobby?</p> <p>The Lobby did not display PUB 13 in English.</p>	<p>Make PUB 13 available in all required languages including: Arabic, Armenian, Cambodian, Chinese, English, Farsi, Hmong, Japanese, Korean, Lao Mien, Portuguese, Punjabi, Russian, Spanish, Tagalog, Ukrainian, Vietnamese (18 languages total)</p> <p>Current PUB 13: 06/11 (Division 21-107.221).</p> <p>Pamphlets supplied by CDSS entitled "Your Rights Under California Welfare Programs" shall be made available in all CWD waiting rooms and reception areas and shall be distributed and explained to each applicant/recipient at intake and reinvestigation of eligibility.</p> <p>The pamphlets shall be in the primary languages of the CWD's applicant/recipient population including alternate formats (cassette tapes, large print, et cetera.).</p> <p>(Division 21-107.221)</p>
<p>Lobby: Receptionist</p> <p>Are Publication 13's in different languages, in braille, in audio and large print available?</p> <p>Receptionist was aware of where to find the Publication 13 in Braille.</p>	<p>Pamphlets supplied by CDSS entitled "Your Rights Under California Welfare Programs" shall be made available in all CWD waiting rooms and reception areas and shall be distributed and explained to each applicant/recipient at intake and reinvestigation of eligibility.</p> <p>The pamphlets shall be in the primary languages of the CWD's applicant/recipient population including alternate formats (e.g., cassette tapes, large print, etc.).</p> <p>(Division 21-107.221)</p>
<p>Interview Room:</p> <p>Designated Interview room does not have a disabled access sign at room entry.</p>	<p>Installation height above finished floor shall be 40 inches maximum.</p> <p>(CA T24 11B - 703.5 Table 57-5)</p> <p>(ADA 703.5) page 379</p>

Facility Element/Finding	Corrective Action
Interview Room: Cedar Room does not have a disabled access sign at room entry.	Installation height above finished floor shall be 40 inches maximum. (CA T24 11B - 703.5 Table 57-5) (ADA 703.5) page 379

- a. **Corrective Actions:** Refer to Corrective Action column above (Section A, 3).
- b. **Recommendation:** Address and submit a Corrective Action Plan to correct all items identified in the Corrective Action column above (Section A, 3).

4. **Facility Location: (101 Park Avenue, Weaverville CA)**

Facility Element/Finding	Corrective Action
Disabled Parking: All disabled parking and access aisle lines need to be repainted because they are faded.	The words " NO PARKING " shall be painted on the surface each access aisle. (CA T24 11B-502.3.3) page 176 This notice shall be painted in white letters a minimum of 12 inches in height and located to be visible from the adjacent vehicular way. (CA 11B-502.3.3) pg. 176 Access aisles shall be marked with a blue painted borderline around their perimeter. (CA T24 11B-502.3.3) (ADA 502.3.3) page 176 The area within the blue borderlines shall be marked with hatched lines a maximum of 36 inches on center in a color contrasting with that of the aisle surface, preferably blue or white. (CA T24 11B-502.3.3) page 176

Facility Element/Finding	Corrective Action
<p>Directional Signage:</p> <p>Directional signage to main entrance available.</p> <p>Disabled directional signage needs to be posted to guide all disabled clients to front entrance.</p>	<p>Directional signs complying with “Visual Characters” heading in Section 57, Signs & Identification, including the International Symbol of Accessibility complying with “International Symbol of Accessibility” heading in Section 57, Signs & Identification, indicating the accessible route to the nearest accessible entrance shall be provided at junctions when the accessible route diverges from the regular circulation path.</p> <p>(CA T24 11B-216.6) page 28</p> <p>Visual characters shall be 40 inches minimum above the finish floor or ground.</p> <p>(CA T24 11B-703.5.6) (ADA 703.5.6) page 376</p>
<p>Bathroom:</p> <p>Disabled bathroom wall sign is missing.</p>	<p>Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side.</p> <p>(CA T24 11B-703.4.2) (ADA 703.4.2) page 311</p> <p>Where there is no wall space at the latch side of a single door or at the right side of double doors, signs shall be located on the nearest adjacent wall.</p> <p>(CA T24 11B-703.4.2) (ADA 703.4.2) page 311</p>
<p>Bathroom:</p> <p>Disabled bathroom door sign.</p> <p>Disabled bathroom door sign is too short at 58 inches and does not have the disabled wheelchair symbol with raised lettering.</p>	<p>The International Symbol of Accessibility shall be mounted at 58 inches minimum and 60 inches maximum above the finish floor or ground surface measured from the centerline of the symbol.</p> <p>(CA T24 11B-703.7.2.6) page 310</p> <p>Where a door is provided the symbol shall be mounted within 1 inch of the vertical centerline of the door.</p> <p>(CA T24 11B-703.7.2.6) page 310</p> <p>Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side.</p> <p>(CA T24 11B-703.4.2) (ADA 703.4.2) page 311</p>

- a. **Corrective Actions:** Refer to Corrective Action column above (Section A, 3).
- b. **Recommendation:** Address and submit a Corrective Action Plan to correct all items identified in the Corrective Action column above (Section A, 3).

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a County may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which it can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through an interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDDs), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, counties must ensure that written materials be available in individuals' primary languages if the forms and materials are provided by CDSS in that language, and that information inserted in notices of action (NOA) be in the individuals' primary language.

A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews

Question: (Please answer yes/no and provide response with comments)	Comments
Does the County identify a client's language need upon first contact? How?	Yes, the County assesses the client's language requirements on first contact.
Does the County use a primary language form?	Yes, a primary language form is used.

Question: (Please answer yes/no and provide response with comments)	Comments
Does the client self-declare on this form?	Yes, clients are able to self-declare.
Are non-English- or limited- English-speaking clients provided bilingual services?	Yes, non-English- or limited- English-speaking clients are provided bilingual services.
After it has been determined that the client is limited-English or non-English speaking, is there a County process for procuring an interpreter?	Yes, the County is able to get interpretive services when needed.
Does the County have a contracted language line provider, a County interpreter list, or any other interpreter process?	Yes, the County has a contracted language line provider and a County interpreter list.
Is there a delay in providing interpretive services?	No, there is no delay. Interpretive services are provided quickly and efficiently.
Are County interpreters certified?	Yes, County interpreters are certified.
Does the County have adequate interpreter services?	Yes, the County has adequate interpreter services.
Does the County allow minors to be interpreters? If so, under what circumstances?	No, the County does not allow minors under the age of 18 to be interpreters.
Does the County allow the client to provide his or her own interpreter?	Yes, a client can bring their own interpreter, and are advised about possible misinformation regarding services.
Does the County ensure that the client-provided interpreter understands what is being interpreted for the client?	Yes, a client can bring their own interpreter and are advised about possible misinformation regarding services.
If there is not a Release of Confidentiality Information form, how and where is the client-provided interpreter documented?	Yes, at interview time a Release of Confidentiality Information form is given to the client and explained. Needed interpretive services are documented in the case file.
Does the County use the CDSS-translated forms in the clients' primary languages?	Yes, the County is aware and does use the CDSS-translated forms in the clients' primary languages.

Question: (Please answer yes/no and provide response with comments)	Comments
Is the information that is to be inserted into NOA translated into the client's primary language?	Yes, the County sends out NOA's in the client's primary language.
If language to be inserted into NOA is not available, is there a procedure to ensure information translated to client's primary language?	Yes, when there no available translated language, the worker explains the form to the client.
Does the County provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?	Yes, the County is generally aware of auxiliary services but the receptionist at the Murray Building. At the Tule Creek Road, Hayfork location, the receptionist was not aware of where to obtain Publication 13 in Braille, Audio, and to obtain a Civil Rights complaint form.
Does the County identify a client with a disability (physical, mental, or learning)?	Yes, the County identifies and documents a client's physical, mental, or learning needs.
Does the County assist clients with self-identifying a disability?	Yes, at intake staff asks the client if there are any reasonable accommodations the client may need.
Does the County have a policy and procedure in place for assisting clients with a disability (physical, mental, or learning)?	Yes, the County has a policy for assisting clients with a disability (physical, mental, or learning).
Does the County offer reasonable accommodations to clients with a disability (physical, mental, or learning)?	Yes, at intake staff asks the client if there are any reasonable accommodations the client may need.
Does the County identify and assist the client who has learning disabilities or a client who cannot read or write?	Yes, when a client has difficulty understanding documents, the worker verbally explains documents given.
Does the County offer a screening for learning disabilities?	Yes, the County has screening for learning disabilities.
Is there an established process for offering a screening?	Yes, there an established process for offering a screening.

Question: (Please answer yes/no and provide response with comments)	Comments
Is the client identified as having a learning disability referred for an evaluation?	Yes, a client identified as having a learning disability is referred for an evaluation.

a. **Corrective Actions:** None.

b. **Recommendation:** None.

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document an applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

CalFresh

Item	How item is Documented
Ethnic Origin	Identified at Eligibility Intake
Method of identifying client's primary language	Identified at Eligibility Intake
Method of documenting client's primary language	Identified at Eligibility Intake
Method of providing bilingual services and documentation	Identified at Eligibility Intake. A client will be assigned a bilingual worker and this is documented in the case file.
Client provided own interpreter	When a client brings their own interpreter it is documented in the case file.
Method to inform client of potential problem using own interpreter	Client is advised verbally and the conversation is documented in the case file.
Release of information to interpreter	The client is given the release of information form and staff explains the form.

Item	How item is Documented
Individuals acceptance or refusal of written material offered in primary language	When a client accepts or refuses written material in their language it is documented in their case file.
Documentation of minor used as interpreter	A minor under 18 is not used as an interpreter but when the client insists, it is documented in the case file.
Documentation of circumstance for using minor interpreter temporarily	A minor under 18 is not used as an interpreter but when the client insists, the circumstance for using a minor is documented in the case file.
Method of identifying client's disability	The client self identifies any disabilities.
Method of documenting client's disability (physical, mental, or learning)	When the client self identifies any disability, it is documented in the case file.
Method of offering a reasonable accommodation to the client with a disability	When a client is offered a reasonable accommodation, verbally, it is documented in the case file.
Method of documenting client's reasonable accommodation	When the client self identifies any disability, it is documented in the case file. Reasonable accommodations are also documented in the case file and at every client interview the reasonable accommodation is acknowledged.

CalWORKs & Employment Services

Item	How item is Documented
Ethnic Origin	Identified at Eligibility Intake
Method of identifying client's primary language	Identified at Eligibility Intake

Item	How item is Documented
Method of documenting client's primary language	Identified at Eligibility Intake
Method of providing bilingual services and documentation	Identified at Eligibility Intake. A client will be assigned a bilingual worker and this is documented in the case file.
Client provided own interpreter	When a client brings their own interpreter it is documented in the case file.
Method to inform client of potential problem using own interpreter	Client is advised verbally and the conversation is documented in the case file.
Release of information to interpreter	The client is given the release of information form and staff explains the form.
Individuals acceptance or refusal of written material offered in primary language	When a client accepts or refuses written material in their language it is documented in their case file.
Documentation of minor used as interpreter	A minor under 18 is not used as an interpreter but when the client insists, it is documented in the case file.
Documentation of circumstance for using minor interpreter temporarily	A minor under 18 is not used as an interpreter but when the client insists, the circumstance for using a minor is documented in the case file.
Method of identifying client's disability	The client self-identifies any disabilities.
Method of documenting client's disability (physical, mental, or learning)	When the client self-identifies any disability, it is documented in the case file.

Item	How item is Documented
Method of offering a reasonable accommodation to the client with a disability	When a client is offered a reasonable accommodation, verbally, it is documented in the case file.
Method of documenting client's reasonable accommodation	When the client self-identifies any disability, it is documented in the case file. Reasonable accommodations are also documented in the case file and at every client interview the reasonable accommodation is acknowledged.

Adult Programs (IHSS/APS)

Item	How item is Documented
Ethnic Origin	Identified at Eligibility Intake
Method of identifying client's primary language	Identified at Eligibility Intake
Method of documenting client's primary language	Identified at Eligibility Intake
Method of providing bilingual services and documentation	Identified at Eligibility Intake. A client will be assigned a bilingual worker and this is documented in the case file.
Client provided own interpreter	When a client brings their own interpreter it is documented in the case file.
Method to inform client of potential problem using own interpreter	Client is advised verbally and the conversation is documented in the case file.
Release of information to interpreter	The client is given the release of information form and staff explains the form.
Individuals acceptance or refusal of written material offered in primary language	When a client accepts or refuses written material in their language it is documented in their case file.

Item	How item is Documented
Documentation of minor used as interpreter	A minor under 18 is not used as an interpreter but when the client insists, it is documented in the case file.
Documentation of circumstance for using minor interpreter temporarily	A minor under 18 is not used as an interpreter but when the client insists, the circumstance for using a minor is documented in the case file.
Method of identifying client's disability	The client self-identifies any disabilities.
Method of documenting client's disability (physical, mental, or learning)	When the client self-identifies any disability, it is documented in the case file.
Method of offering a reasonable accommodation to the client with a disability	When a client is offered a reasonable accommodation, verbally, it is documented in the case file.
Method of documenting client's reasonable accommodation	When the client self-identifies any disability, it is documented in the case file. Reasonable accommodations are also documented in the case file and at every client interview the reasonable accommodation is acknowledged.

Foster Care

Item	How item is Documented
Ethnic Origin	Identified at Initial contact.
Method of identifying client's primary language	Identified at Initial contact.
Method of documenting client's primary language	Identified at Initial contact.

Item	How item is Documented
Method of providing bilingual services and documentation	Identified at Initial contact. A client will be assigned a bilingual worker and this is documented in the case file.
Client provided own interpreter	When a client brings their own interpreter it is documented in the case file.
Method to inform client of potential problem using own interpreter	Client is advised verbally and the conversation is documented in the case file.
Release of information to interpreter	The client is given the release of information form and staff explains the form.
Individuals acceptance or refusal of written material offered in primary language	When a client accepts or refuses written material in their language it is documented in their case file.
Documentation of minor used as interpreter	A minor under 18 is not used as an interpreter but when the client insists, it is documented in the case file.
Documentation of circumstance for using minor interpreter temporarily	A minor under 18 is not used as an interpreter but when the client insists, the circumstance for using a minor is documented in the case file.
Method of identifying client's disability	The client self-identifies any disabilities.
Method of documenting client's disability (physical, mental, or learning)	When the client self-identifies any disability, it is documented in the case file.
Method of offering a reasonable accommodation to the client with a disability	When a client is offered a reasonable accommodation, verbally, it is documented in the case file.

Item	How item is Documented
Method of documenting client's reasonable accommodation	When the client self-identifies any disability, it is documented in the case file. Reasonable accommodations are also documented in the case file and at every client interview the reasonable accommodation is acknowledged.

Fraud

Item	How item is Documented
Ethnic Origin	Identified at Initial contact.
Method of identifying client's primary language	Identified at Initial contact.
Method of documenting client's primary language	Identified at Initial contact.
Method of providing bilingual services and documentation	Identified at Initial contact. A client will be assigned a bilingual worker and documented in the case file.
Client provided own interpreter	When a client brings their own interpreter it is documented in the case file.
Method to inform client of potential problem using own interpreter	Client is advised verbally and the conversation is documented in the case file.
Release of information to interpreter	The client is given the release of information form and staff explains the form.
Individuals acceptance or refusal of written material offered in primary language	When a client accepts or refuses written material in their language it is documented in their case file.
Documentation of minor used as interpreter	A minor under 18 is not used as an interpreter but when the client insists, it is documented in the case file.

Item	How item is Documented
Documentation of circumstance for using minor interpreter temporarily	A minor under 18 is not used as an interpreter but when the client insists, the circumstance for using a minor is documented in the case file.
Method of identifying client's disability	The client self-identifies any disabilities.
Method of documenting client's disability (physical, mental, or learning)	When the client self-identifies any disability, it is documented in the case file.
Method of offering a reasonable accommodation to the client with a disability	When a client is offered a reasonable accommodation, verbally, it is documented in the case file.
Method of documenting client's reasonable accommodation	When the client self identifies any disability, it is documented in the case file. Reasonable accommodations are also documented in the case file and at every client interview the reasonable accommodation is acknowledged.

Children's Services

Item	How item is Documented
Ethnic Origin	Identified at Initial contact.
Method of identifying client's primary language	Identified at Initial contact.
Method of documenting client's primary language	Identified at Initial contact.
Method of providing bilingual services and documentation	Identified at Initial contact. A client will be assigned to a bilingual worker and this is documented in the case file.
Client provided own interpreter	When a client brings their own interpreter it is documented in the case file.

Item	How item is Documented
Method to inform client of potential problem using own interpreter	Client is advised verbally and the conversation is documented in the case file.
Release of information to interpreter	The client is given the release of information form and staff explains the form.
Individuals acceptance or refusal of written material offered in primary language	When a client accepts or refuses written material in their language it is documented in their case file.
Documentation of minor used as interpreter	A minor under 18 is not used as an interpreter but when the client insists, it is documented in the case file.
Documentation of circumstance for using minor interpreter temporarily	A minor under 18 is not used as an interpreter but when the client insists, the circumstance for using a minor is documented in the case file.
Method of identifying client's disability	The client self-identifies any disabilities.
Method of documenting client's disability (physical, mental, or learning)	When the client self-identifies any disability, it is documented in the case file.
Method of offering a reasonable accommodation to the client with a disability	When a client is offered a reasonable accommodation, verbally, it is documented in the case file.
Method of documenting client's reasonable accommodation	When the client self-identifies any disability, it is documented in the case file. Reasonable accommodations are also documented in the case file and at every client interview the reasonable accommodation is acknowledged.

a. **Corrective Actions:** None.

b. **Recommendation:** None.

VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights, cultural awareness, Section 504 of the Rehabilitation Act of 1973 (Section 504), and ADA training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

A. Findings

Interview Questions: (Please answer yes/no and provide response with comments)	Comments
Are employees trained in the requirement of Section 504 and ADA?	Yes, Section 504 and ADA training is completed during annual training.
Do employees receive continued Division 21 Training?	Yes, Division 21 training is completed during annual training.
Do employees understand the County policy regarding a client's rights and procedure to follow when receiving a discrimination complaint?	Yes, several receptionists were asked questions about when a client needs to file a complaint and how it has to be processed.
Does the County provide employees Cultural Awareness Training?	Yes, Cultural Awareness training is completed during annual training.
Do the CSW's have an understanding of Multi-Ethnic Placement Act (MEPA)?	Yes. MEPA training is also completed during annual training.
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	Yes, Trinity County is a small county, which provides close contact with clients that come into the office.
Does the County provide training on how to identify clients with disabilities (physical, mental & learning)?	Yes, training on how to identify clients with disabilities (physical, mental & learning) is completed during annual training.

Interview Questions: (Please answer yes/no and provide response with comments)	Comments
Do employees receive training on reasonable accommodation for clients with disabilities?	Yes, training on how employees understand the County policy regarding clients with disabilities, including reasonable accommodations, is completed during a classroom annual training.
Do the employees understand the County policy regarding a client's right to a reasonable accommodation?	Yes, training on how employees understand the County policy regarding a client's right to a reasonable accommodation is accomplished during annual training.

VIII. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinators' responsibility to maintain this log.

A. Findings from Staff Interviews, Civil Rights Coordinator, and Program Manager Surveys

Interview and Review Areas: (Please answer yes/no and provide response with comments)	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	Yes, employees can easily identify the difference between a program, discrimination, and a personnel complaint. This information is a critical question asked in the worker questionnaire given to ten workers at each building audited.
Do the employees know who the Civil Rights Coordinator is?	Yes, staff were asked and were well aware that Letty Garza is the Civil Rights Coordinator.

Interview and Review Areas: (Please answer yes/no and provide response with comments)	Findings
Do the employees know the location of the Civil Rights poster "Everyone is Equal... (PUB 86)" with information as to how and where the clients can file a discrimination complaint?	Yes, staff asked knew the location of the Civil Rights poster "Everyone is Equal... (PUB 86)" with information as to how and where the clients can file a discrimination complaint.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	Yes the Civil Rights Coordinator keeps the complaint log complete and up to date.

a. **Corrective Actions:** None.

b. **Recommendation:** None.

IX. VENDOR CONTRACTS

Counties are required to ensure contracted services with contractors, vendors, consultants, and other providers of service, who receive state or federal assistance, include the assurance of compliance agreement.

A. Contracts Review

Number of Contracts Reviewed	5
Number of Contracts with an Assurance of Compliance Agreement	5

i. **Corrective Actions:** None.

ii. **Recommendation:** None.

X. CALL CENTER EVALUATION

County Call/Service Centers are evaluated to ensure services provided are nondiscriminatory toward non-English speaking clients and clients with a disability (physical, mental, or learning).

A. Findings from Call/Service Center Site Visit and Interviews

Question: (Please answer yes/no and provide response with comments)	Comments
Does the County have a Call Center/Service Center?	No. This County is small in size.

i. **Corrective Actions:** None.

ii. **Recommendation:** None.

XI. COMMUNITY INPUT

As a part of this review, and as noted in Section II, feedback was sought from community and advocate groups.

A. Major Observations

- Trinity Community Clinic – Reached out to Trinity Community Clinic and they failed to respond.
- Shasta Community College – Reached out to Shasta Community College and they failed to respond.

XII. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The Trinity County Health & Human Services Department Civil Rights Compliance Plan for the period May 1, 2018 to April 30, 2019, was received on February 16, 2018. It is approved as submitted.

XIII. CONCLUSION

The CDSS Reviewer found the Trinity County Health & Human Services Department staff warm, welcoming, informative and very supportive. Particular thanks to Letty Garza, Civil Rights Coordinator, for organizing the details of the review, and to Liz Hamilton who assisted in each of the facility reviews. In each District Office, staff were very helpful with the facility reviews, case reviews, and computer assistance.

The CDSS found the Trinity County Health & Human Services Department in satisfactory compliance with CDSS Division 21 Regulations, and other applicable state and federal laws. County staff continues to reflect a commitment similar to that

expressed by management with respect to ensuring access, assistance, and compliance.

The Trinity County Health & Human Services Department must remedy the deficiencies identified in this report by taking corrective actions. A CAP must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule of all actions that will be taken to correct the deficiencies, and an indication of who will be responsible for implementing the corrective action.

It is CDSS' intent that this report be used to create a positive interaction between the County and CDSS to identify and correct compliance violations and to provide the County with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights Unit staff is available to provide technical assistance as requested.